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6 UNITED STATES DISTRICT COURT  
7 DISTRICT OF NEVADA

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9 UNITED STATES OF AMERICA,  
10 Plaintiff,  
11 vs.  
12 WAYNE SONE,  
13 Defendant.

Case No. 2:14-cr-00220-01-JCM-GWF

STIPULATION FOR PROTECTIVE ORDER

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15 IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel G. Bogden,  
16 United States Attorney for the District of Nevada, and Christina M. Brown, Assistant United States  
17 Attorney, counsel for the United States, Christopher R. Oram, counsel for defendant WAYNE  
18 SONE, that this Court issue an Order protecting from disclosure to the public any discovery  
19 documents containing the personal identifying information such as social security numbers, driver's  
20 license numbers, dates of birth, or addresses, of participants, witnesses and victims in this case.  
21 Such documents shall be referred to hereinafter as "Protected Documents." The parties state as  
22 follows:

23 1. Protected Documents which will be used by the government in its case in chief  
24 include personal identifiers, including social security numbers, driver's license numbers, dates of

1 birth, and addresses, of participants, witnesses, and victims in this case.

2 2. Discovery in this case is voluminous. Many of the documents include personal  
3 identifiers. Redacting the personal identifiers of participants, witnesses, and victims would prevent  
4 the timely disclosure of discovery to defendants.

5 3. The United States agrees to provide Protected Documents without redacting the  
6 personal identifiers of participants, witnesses, and victims.

7 4. Access to Protected Documents will be restricted to persons authorized by the Court,  
8 namely defendant, attorney(s) of record and attorneys' paralegals, investigators, experts, and  
9 secretaries employed by the attorney(s) of record and performing on behalf of defendant.

10 5. The following restrictions will be placed on defendant, defendant's attorney(s) and  
11 the above-designated individuals unless and until further ordered by the Court. Defendants,  
12 defendants' attorneys and the above-designated individuals shall not:

- 13 a. make copies for, or allow copies of any kind to be made by any other person  
14 of Protected Documents;
- 15 b. allow any other person to read Protected Documents; and
- 16 c. use Protected Documents for any other purpose other than preparing to defend  
17 against the charges in the Superseding Indictment or any further superseding indictment arising out  
18 of this case.

19 6. Defendant's attorney(s) shall inform any person to whom disclosure may be made  
20 pursuant to this order of the existence and terms of this Court's order.

21 7. The requested restrictions shall not restrict the use or introduction as evidence of  
22 discovery documents containing personal identifying information such as social security numbers,  
23 driver's license numbers, dates of birth, and addresses during the trial of this matter.

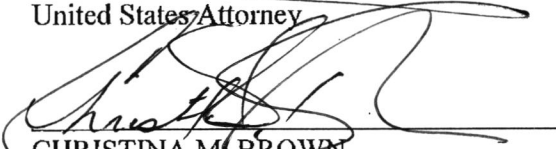
24 . . .

8. Upon conclusion of this action, defendant's attorney(s) shall return to government counsel or destroy and certify to government counsel the destruction of all discovery documents containing personal identifying information such as social security numbers, driver's license numbers, dates of birth, and addresses within a reasonable time, not to exceed thirty days after the last appeal is final or as otherwise required by counsel's professional responsibility requirements.


9. The defendant shall not be permitted to download onto electronic devices, copy, otherwise duplicate or remove discovery materials, or remove notes taken from discovery from the defendant's attorney's office or permit any other person to do so. The defendant shall only have access to discovery materials while in the presence of the defendant's attorney or his or her agent while at the defendant's attorney's office.

DATED this 15 day of July, 2014.

DANIEL G. BOGDEN  
United States Attorney

  
CHRISTINA M. BROWN  
Assistant U.S. Attorney

CHRISTOPHER R. ORAM.

  
CHRISTOPHER R. ORAM  
Attorney for Wayne Sone

**ORDER**

IT IS SO ORDERED this 17th day of July, 2014.

  
GEORGE FOLEY, JR.  
United States Magistrate Judge